

1 COOLEY GODWARD LLP  
JOHN C. DWYER (136533) ([dwyerjc@cooley.com](mailto:dwyerjc@cooley.com))  
2 JEFFREY M. KABAN (235734) ([jkaban@cooley.com](mailto:jkaban@cooley.com))  
Five Palo Alto Square  
3 3000 El Camino Real  
Palo Alto, CA 94306-2155  
4 Telephone: (650) 843-5000  
Facsimile: (650) 843-0663  
5  
6 Attorneys for Nominal Defendant  
Power Integrations, Inc.

7  
8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10 SAN FRANCISCO DIVISION  
11

12 Kimberly Quaco, Derivatively on Behalf of  
Nominal Defendant POWER  
13 INTEGRATIONS, INC.,

14 Plaintiff,

15 v.

16 Balu Balakrishnan, *et al.*,

17 Defendants,

18 Power Integrations, Inc.,

19 Nominal Defendant.

Case No. C-06-2811-MHP

**STIPULATION ESTABLISHING A SERVICE  
DATE AND EXTENDING TIME FOR  
DEFENDANTS' RESPONSE TO THE  
AMENDED COMPLAINT**

20  
21 Pursuant to Civil Local Rule 6-1, the parties submit the following Stipulation Establishing  
22 a Service Date and Extending Time for Defendants' Response to Plaintiff's Amended Complaint.

23 WHEREAS, plaintiff Kimberly Quaco filed the original complaint in this action on April  
24 25, 2006, naming nominal defendant Power Integrations, Inc. and defendants Balu Balakrishnan,  
25 Alan D. Bickell, R. Scott Brown, Howard F. Earhart, E. Floyd Kvamme, and Clifford J. Walker  
26 ("Original Individual Defendants");

27 WHEREAS, the parties stipulated on May 10, 2006, to allow plaintiff to file an amended  
28 complaint;

1 WHEREAS, on May 26, 2006 plaintiff filed the Amended Complaint;

2 WHEREAS, the Amended Complaint added ten new parties: Derek Bell, Nicholas E.  
3 Brathwaite, John M. Cobb, Roderick D. Davies, Balakrishnan S. Iyer, Bruce Renouard, Vladimir  
4 Rumennik, Daniel M. Selleck, Robert G. Staples, and John Tomlin ("New Individual  
5 Defendants");

6 WHEREAS, plaintiff has not yet served the Amended Complaint on all of the New  
7 Individual Defendants;

8 WHEREAS, the Original Individual Defendants are no longer represented by the same  
9 counsel as nominal defendant Power Integrations, Inc.;

10 WHEREAS, new counsel for the Original Individual Defendants has only recently been  
11 retained;

12 WHEREAS, the parties agree it would be most efficient for the Court and the parties for  
13 there to be a single date established by which defendants shall respond to the Amended  
14 Complaint;

15 WHEREAS, the establishment of a single date by which all defendants must respond to  
16 the Amended Complaint will help avoid piecemeal litigation;

17 WHEREAS, the schedule contemplated by this Stipulation will allow new counsel for the  
18 individual defendants to prepare adequately;

19 WHEREAS, the only date or deadlines set by Court order are the Joint Case Management  
20 Statement due September 1, 2006 and the Case Management Conference set for September 11,  
21 2006; and

22 WHEREAS, this stipulation will not effect the deadline for the filing of the Joint Case  
23 Management Statement or the date of the Case Management Conference;

24 NOW THEREFORE, IT IS HEREBY STIPULATED, by and between the undersigned, as  
25 follows:

26 **1.** Counsel for the New Individual Defendants will accept service on behalf of their  
27 clients without thereby waiving any objection to venue or jurisdiction;

28 **2.** The Amended Complaint shall be deemed served on all parties as of August 14,

1 2006;

2 3. Defendants shall respond to plaintiff's Amended Complaint on or before  
3 September 12, 2006.

4  
5  
6 Dated: June 21, 2006

BORNSTEIN & BORNSTEIN

7  
8  
9 /S/ (With express authorization)  
Jonathan Herschel Bornstein

10 Attorneys for Plaintiff

11  
12 *Filer's Attestation: Pursuant to General Order*  
13 *No. 45, Section X(B) regarding signatures, Jeffrey*  
14 *M. Kaban hereby attests that concurrence in the*  
*filing of this document has been obtained*

15 Dated: June 21, 2006

COOLEY GODWARD LLP

16  
17  
18 /S/  
John C. Dwyer  
Jeffrey M. Kaban

19 Attorneys for Nominal Defendant  
20 Power Integrations, Inc.

1 Dated: June 21, 2006

LATHAM & WATKINS LLP

2  
3 /S/ (With express authorization)

4 Jay L. Pomerantz

Peter A. Wald

5 Attorneys for Defendants

6 Balu Balakrishnan, Alan D. Bickell, Nicholas E.  
7 Brathwaite, R. Scott Brown, Balakrishnan S. Iyer,  
8 and E. Floyd Kvamme

9 *Filer's Attestation: Pursuant to General Order*  
10 *No. 45, Section X(B) regarding signatures, Jeffrey*  
11 *M. Kaban hereby attests that concurrence in the*  
12 *filing of this document has been obtained*

13  
14 Dated: June 21, 2006

HELLER EHRMAN LLP

15  
16 /S/ (With express authorization)

17 Norman J. Blears

Michael L. Charlson

18 Attorneys for Defendants

19 Derek Bell, Roderick D. Davies, Bruce Renouard  
20 Vladimir Rumennik, Daniel M. Selleck,  
21 John Tomlin and Clifford J. Walker

22 *Filer's Attestation: Pursuant to General Order*  
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25 *filing of this document has been obtained*

26  
27 Dated: June 21, 2006

TOWNSEND AND TOWNSEND AND CREW LLP

28  
29 /S/ (With express authorization)

Leigh A. Kirmsse

Attorneys for Defendant

John M. Cobb

1 Dated: June 21, 2006

MORRISON & FOERSTER

2  
3 /S/ (With express authorization)  
Jordan Eth

4  
5 Attorneys for Defendant  
Robert G. Staples

6 *Filer's Attestation: Pursuant to General Order*  
7 *No. 45, Section X(B) regarding signatures, Jeffrey*  
8 *M. Kaban hereby attests that concurrence in the*  
*filing of this document has been obtained*

9 Dated: June 21, 2006

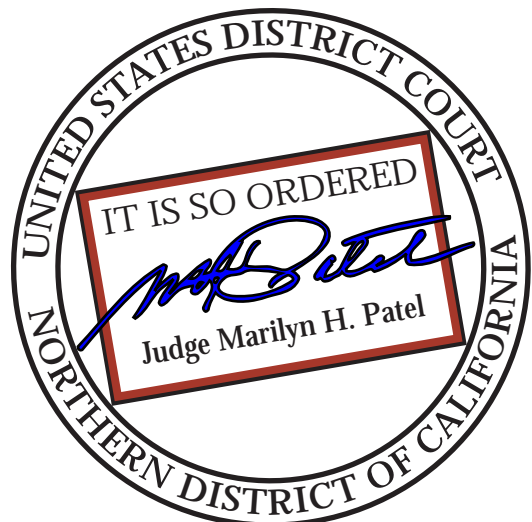
FENWICK & WEST LLP

10  
11 /S/ (With express authorization)  
Emmett C. Stanton

12  
13 Attorneys for Defendant  
Howard F. Earhart

14 *Filer's Attestation: Pursuant to General Order*  
15 *No. 45, Section X(B) regarding signatures, Jeffrey*  
16 *M. Kaban hereby attests that concurrence in the*  
*filing of this document has been obtained*

17  
18  
19 June 22, 2006



**PROOF OF SERVICE**  
**(FRCP 5)**

I am a citizen of the United States and a resident of the State of California, over the age of 18 years, and not a party to the within action. I am employed in Santa Clara County, State of California, in the office of a member of the bar of this Court, at whose direction the service was made. My business address is Cooley Godward LLP, Five Palo Alto Square, 3000 El Camino Real, Palo Alto, CA 94306-2155. On June 21, 2006, I served the following documents on the parties listed below in the manner(s) indicated:

**STIPULATION ESTABLISHING A SERVICE DATE AND EXTENDING TIME FOR DEFENDANTS' RESPONSE TO THE AMENDED COMPLAINT**

- ☐ (BY U.S. MAIL) I am personally and readily familiar with the business practice of Cooley Godward LLP for collection and processing of correspondence for mailing with the United States Postal Service, and I caused such envelope(s), with postage fully prepaid, to be deposited with the U.S. Postal Service.
- ☐ (BY MESSENGER SERVICE) I consigned the document(s) to an authorized courier and/or process server for hand delivery on this date.
- ☐ (BY FACSIMILE) I am personally and readily familiar with the business practice of this firm for collection and processing of documents to be transmitted by fax and I caused such document(s) on this date to be faxed to the offices of addressee(s) at the numbers listed below.
- ☒ (BY OVERNIGHT MAIL) I am personally and readily familiar with the business practice of this firm for collection and processing of correspondence for overnight delivery, and I caused such document(s) to be deposited with a facility regularly maintained by FedEx for overnight delivery.
- ☒ (BY ELECTRONIC MAIL) I am personally and readily familiar with the business practice of this firm for the preparation and processing of documents in portable document format (PDF) for e-mailing, and I prepared said documents in PDF and then served them by e-mailing them to the following internet addresses.

Jay L. Pomerantz, Esq.  
**Latham & Watkins LLP**  
 140 Scott Drive  
 Menlo Park, CA 94025  
 Phone: (650) 328-4600  
 Direct: (650) 463-4684  
 Fax: (650) 463-2600  
[jay.pomerantz@lw.com](mailto:jay.pomerantz@lw.com)

Peter A. Wald, Esq.  
**Latham & Watkins LLP**  
 505 Montgomery Street, Suite 2000  
 San Francisco, CA 94111-2562

1 Phone: (415) 391-0600  
2 Direct: (415) 395-8006  
3 Fax: (415) 395-8095  
4 peter.wald@lw.com

5 Norman J. Blears, Esq.  
6 Michael L. Charlson, Esq.  
7 **Heller Ehrman LLP**  
8 275 Middlefield Road  
9 Menlo Park, CA 94025-3506  
10 Phone: (650) 324-7000  
11 Direct: (650) 324-7017  
12 Fax: (650) 324-0638  
13 norman.blears@hellerehrman.com

14 Leigh A. Kirmsse, Esq.  
15 **Townsend and Townsend and Crew LLP**  
16 Two Embarcadero Center, 8th Floor  
17 San Francisco, CA 94111-3834  
18 Phone: (415) 576-0200  
19 Fax: (415) 576-0300  
20 lakirmsse@townsend.com

21 Jordan Eth, Esq.  
22 **Morrison & Foerster**  
23 425 Market Street  
24 San Francisco, California 94105-2482  
25 Phone: (415) 268-7000  
26 Direct: (415) 268-7126  
27 Fax: (415) 268-7522  
28 jeth@mofo.com

Emmett C. Stanton, Esq.  
Fenwick & West LLP  
801 California Street  
Mountain View, CA 94041  
Phone: (650) 988-8500  
Direct: (650) 335-7175  
Fax: (650) 938-5200  
estanton@fenwick.com

Emmett C. Stanton, Esq.  
I declare under penalty of perjury that the foregoing is true and correct. Executed on  
June 21, 2006, at Palo Alto, California.

/s/

Jeffrey M. Kaban